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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:  
  
ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**FACEBOOK, INC.'S UNOPPOSED  
MOTION FOR AN ENLARGEMENT OF  
TIME TO FILE STATEMENT IN  
SUPPORT OF SEALING**

1 Pursuant to Civil Local Rule 6-3, Facebook, Inc. (“Facebook”) respectfully requests an  
2 enlargement of the time to submit materials in support of sealing in regard to Plaintiffs’  
3 Administrative Motion To Consider Whether Another Party’s Material Should Be Sealed (Dkt. 765).  
4 Plaintiffs do not oppose Facebook’s request.

5 On December 8, 2021, Special Master Daniel Garrie issued an Order Regarding Production of  
6 ADI Related Documents (the “Order”). The Special Master’s Order and exhibits include the names  
7 of Facebook’s consulting experts, which the Court has previously sealed. The Order attaches as  
8 exhibits over 600 pages of briefing and exhibits submitted by the parties, which include over 350  
9 pages of materials that Facebook produced as Confidential or Highly Confidential – Attorneys’ Eyes  
10 Only under the Protective Order, Dkt. 122, as well as additional unredacted versions of documents  
11 the Court has already ordered sealed in this action.

12 The Special Master ordered Plaintiffs to file the Order with the Court on behalf of the Special  
13 Master. On December 15, 2021 Plaintiffs filed an Administrative Motion To Consider Whether  
14 Another Party’s Material Should Be Sealed (Dkt. 765) pursuant to Civil Local Rule 79-5(f).  
15 Plaintiffs attached a redacted version of the Special Master’s Order (Dkt. 765-2), as well as an  
16 unredacted version of the Order (Dkt. 765-3).

17 Pursuant to Civil Local Rule 79-5(f), the deadline for Facebook to file a statement and/or  
18 declaration in support of sealing is seven days after the filing of Plaintiffs’ Administrative Motion  
19 (December 22, 2021). Facebook asked Plaintiffs for their agreement to stipulate to an enlargement of  
20 time by seven business days for Facebook file supporting materials. Swanson Decl. ¶ 4. Plaintiffs’  
21 counsel informed Facebook that they do not oppose Facebook’s request for an enlargement of time,  
22 but would not stipulate to an extension. *Id.*; *id.* Ex. A.

23 Facebook respectfully requests that Facebook’s time to file a statement and declaration in  
24 support of sealing be enlarged by seven additional business days because the large volume of  
25 materials designated Confidential or Highly Confidential – Attorneys’ Eyes Only attached as exhibits  
26 to the Order will require significant time to evaluate for confidential material, particularly given the  
27 upcoming holidays. *See* Swanson Decl. ¶ 3. Plaintiffs do not oppose this request, and granting this  
28 extension—which relates only to sealing—will not affect the schedule of this action. *Id.* ¶¶ 3, 6–7.

1 For these reasons, Facebook respectfully requests that the Court grant Facebook an  
2 enlargement of time by seven business days to submit a statement and/or declaration in support of the  
3 confidentiality of materials attached to Plaintiffs' Administrative Motion.  
4

5 Dated: December 18, 2021

**GIBSON, DUNN & CRUTCHER, LLP**

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